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RICHARD ACOSTA

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,
v.
RICHARD ACOSTA,
Defendant.

Case No. 17-CR-00337-HSG

**STIPULATION AND [PROPOSED] ORDER
TO MODIFY CONDITIONS OF
PRETRIAL RELEASE AS MODIFIED**

RICHARD ACOSTA,
Defendant

Defendant Richard Acosta is seeking permission to modify his conditions of pretrial according to stipulation between the parties.

Mr. Acosta's minor daughter, S. A., of whom Mr. Acosta has joint custody, will be spending the summer months at a tennis program and staying with her grandmother, Carolyn Cults, at Ms. Cults' home in Atwater, California (in the Eastern District of California). Mr. Acosta will continue to reside at home in Oakland under his current terms of pretrial release but asks that the Court grant him permission to travel to Ms. Cults' home in the event of an emergency or to visit his daughter as directed by Pretrial Services. Mr. Acosta will notify and

1 communicate with defense counsel and Pretrial Services if such circumstance were to occur.
2 Pretrial Services has been notified of this request and has no objection.

3 The parties therefore request and stipulate that Mr. Acosta be granted the Court's
4 permission to travel to and reside at Carolyn Cults' residence at 151 Castle Drive, Atwater, CA
5 95301 in the event of an emergency or in order to visit his daughter as directed by Pretrial
6 Services.

7 DATED: June 21, 2017

Respectfully submitted,

9 BRIAN STRETCH
United States Attorney

10 /s/
11 SHEILA ARMBRUST
Assistant United States Attorney

12 /s/
13 JAMES R. STEVENS
14 Wolf, Pennella & Stevens, LLP
15 Attorney for Defendant
16 Richard Acosta

17 IT IS SO ORDERED.

18 DATED: 6/23/17

19 
20 HON. KANDIS WESTMORE
21 United States Magistrate Judge